

DeMaria, Eva

From: DeMaria, Eva
Sent: Friday, August 21, 2015 12:29 PM
To: 'LIVERMAN Alex'
Cc: 'MCCLINCY Matt'; 'ORR Jim'; Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com)
Subject: RE: SCE for Calbag ECSI # 5059, EPA final comments
Attachments: Calbag Metals SCE Comments_062615_FINAL.pdf

Hi all-

Attached, please find EPA's final comments on Calbag's SCE report dated 7/31/2014. It remains unchanged from the draft comments EPA sent on 6/28/15. Please call or email if you have questions. Thanks.

Eva

From: DeMaria, Eva
Sent: Monday, August 17, 2015 4:45 PM
To: 'LIVERMAN Alex'
Cc: MCCLINCY Matt; ORR Jim; Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com)
Subject: RE: SCE for Calbag ECSI # 5059, EPA draft comments

Alex-

Unless we hear otherwise, we plan to finalize our comments on the SCE for Calbag without any revisions. In your email below, you stated that we did not address a key line of evidence by not comparing analytical results to the rank order curves from App E of the DEQ Guidance. While we did not explicitly describe "rank order curves," we did make a specific comment in paragraph 3b that, "The DEQ SCE stormwater charts presented in Figures 7A through 7M show elevated concentrations of cadmium, copper, lead, and nickel relative to typical industrial stormwater discharges." You also noted that we should evaluate the potential for sediment recontamination as evidenced by elevated levels in river (I'm assuming you mean SDUs). In future comments, we will strive to be clearer in our use of the rank order curves and other lines of evidence. Thanks.

Eva

From: LIVERMAN Alex [<mailto:liverman.alex@deq.state.or.us>]
Sent: Wednesday, August 05, 2015 4:46 PM
To: DeMaria, Eva
Cc: MCCLINCY Matt; ORR Jim; Sheldrake, Sean
Subject: RE: SCE for Calbag ECSI # 5059, EPA draft comments

Hi Eva.

Thanks for checking in on this one. We reviewed the EPA draft comments and also received comments from the City and did our own review of the SCE. The concerns highlighted by all these parties line up pretty well, so we have crafted a plan for how to move the site to completion. We plan to request changes to the figures, tables and text to correct factual errors and also point out where we critical lines of evidence for the evaluation are missing. While we don't anticipate a full re-write (and want to avoid the delays of that since there are lawyers involved and the first draft took around a year to get submitted), DEQ will present a full lines of evidence evaluation, from our perspective, in the draft SCD memo that we eventually prepare and share with EPA for review and comment prior to finalization.

In keeping with our on-going discussions about the history and evolution of the stormwater source control program and in line with the JSCS lines/weight of evidence approach, we have one request for you to consider including in these and future comments on other sites. While we agree with the comments presented on data quality, application of the DEQ Guidance storm event protocols, and screening of the data against the JSCS SLVs and FS PRGs, etc., your comments omit a key line of evidence, which is comparison to the rank-order curves from App E of the DEQ Guidance. As we are sorting through any differences about interpretation and use of the curves, we think it is important to mention this tool in your comments. This maintains consistency with EPA comments on previously reviewed decisions on other sites and acknowledges the importance of a variety of lines of evidence, which is a foundational piece of the JSCS (and EPA national remediation guidance).

Another important line of evidence that DEQ stresses in evaluating the potential for sediment recontamination, is whether the CoCs in any media reaching the river in exceedance of SLVs/PRGs are also found at elevated levels in the sediment there. While this doesn't get at in-water risk, it is an important refinement in evaluating SLV/PRG exceedance for the JSCS objective of preventing recontamination for upland sites.

Thanks for considering amending your comments before making them final. We look forward to our on-going discussions on refining our approaches into better alignment as you get familiar with the process and have more sites reviewed and perspective gained.

--Alex

From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]
Sent: Tuesday, August 04, 2015 11:46 AM
To: Sheldrake, Sean; ORR Jim
Cc: MCCLINCY Matt; Allen, Michael
Subject: RE: SCE for Calbag ECSI # 5059, draft comments

Hi Jim-

Did ODEQ have an response/concerns regarding EPA's draft comments on Calbag? Thanks.

Eva

From: Sheldrake, Sean
Sent: Sunday, June 28, 2015 12:16 PM
To: ORR Jim
Cc: mcclincy.matt@deq.state.or.us; Allen, Michael; DeMaria, Eva
Subject: FW: SCE for Calbag ECSI # 5059, draft comments

Hello Jim, Please see EPA's draft comments, attached. Let me know if you have any thoughts or questions.

Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM
EPA Region 10, 1200 Sixth Ave., Suite 900; Mailstop DOC-01
Seattle, WA 98101
206.553.1220 desk
206.225.6528 cell
<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
<http://www.epa.gov/region10/dive/>
206.553.6379 Dive Operations Center
206.369.7500 Dive Unit cell
Like us on Facebook! <https://www.facebook.com/EPADivers>

From: ORR Jim [<mailto:orr.jim@deg.state.or.us>]
Sent: Tuesday, June 09, 2015 3:47 PM
To: Sheldrake, Sean; LIVERMAN Alex; 'Scheffler, Linda'; Koch, Kristine
Subject: SCE for Calbag ECSI # 5059

Here is a DEQ FTP link for the source control evaluation for Calbag ECSI # 5056. Please let me know when you may comment. Thanks

ftp://degftp2.deg.state.or.us/jorr/Calbag_SCE_Report_R3_7_31_14_with_Appendices.pdf

Jim Orr
DEQ NWR Project Manager
700 NE Multnomah St Suite 600
Portland, OR 97232
503-229-5039